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Attorney for Defendant NatWest Markets N.V.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC, and
Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO BANK, N.V. (presently known as
NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05354 (CGM)

Adv. Pro. No. 11-02760 (CGM)

NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(c)(1)

Pursuant to Federal Rule of Civil Procedure 41(c)(1), defendant NatWest Markets N.V. (formerly known as ABN AMRO N.V.)¹ hereby gives notice that its counterclaims are voluntarily dismissed. Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the Estate of Bernard L. Madoff (“Madoff”) has not filed a responsive pleading. On October 4, 2023, the Court granted in part and denied in part NatWest’s motion for leave to amend its affirmative defenses. *See* Dkt. 294. In light of that ruling, NatWest’s counterclaims, which mirror the affirmative defenses, are no longer necessary. Accordingly, Defendant notices voluntary dismissal of its counterclaims, without prejudice. *See* Fed. R. Civ. P. 41(a)(1)(B).

Dated: October 26, 2023

Respectfully submitted,

/s/ Michael S. Feldberg

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¹ After the events at issue in this litigation, ABN AMRO Bank N.V., a financial institution organized under laws of the Netherlands, was renamed The Royal Bank of Scotland N.V. and was later renamed again as NatWest Markets N.V. To avoid confusion with defendants in other Madoff adversary proceedings with similar names, “Defendant” or “NatWest” has been used throughout.